

REMARKS

Claims 1-24 are pending in the present patent application. Claims 1-24 are rejected. By this amendment, claims 1, 5, 11, 14, 20, and 23 have been amended. Claims 3, 12 and 21 have been canceled. This application now includes claims 1, 2, 4-11, 13-20, and 22-24.

Please cancel claims 3, 12 and 21 without prejudice or disclaimer. Claim 3 has been incorporated in part into claim 1, as amended; claim 12 has been incorporated in part into claim 11, as amended; and claim 21 has been incorporated in part into claim 20, as amended.

Reconsideration of the rejection of now pending claims 1, 2, 4-11, 13-20, and 22-24 is respectfully requested.

Claims 3, 5-9, 11-19 and 21 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Claims 3, 12, and 21 have been canceled. Applicants have amended claims 5, 11, and 14 to address the Examiner's expressed concerns. Accordingly, Applicants respectfully request that the rejection under 35 U.S.C. 112, second paragraph, be withdrawn.

Claims 1-3, 5-8, 10-11, 13-17, 19-21 and 23-24 were rejected under 35 U.S.C. 102(b) as being unpatentable over US 5,287,164 (Watanabe).

Claim 1 as amended now recites, in part, that "said top sheet of print media being located in only one of said first media tray and said second media tray" and that "said sheet feeder mechanism including a biasing mechanism coupled to said sheet picking roller, said sheet picking roller being biased by said biasing mechanism to move in a first direction to engage said top sheet of print media, regardless of which of said first media tray and said second media tray contains said top sheet of print media."

The term "bias" is used consistent with the traditional meaning in the mechanical arts, wherein bias is brought about by a reference force that is applied constantly. In contrast to claim 1, Watanabe does not provide a "bias mechanism" to *bias* pickup roller 37, but rather, discloses a motor

driven lead screw arrangement for selectively positioning pickup roller 37 in direction x and vertically in direction y (column 3, lines 49-68).

Further, in the configuration of Watanabe, first tray 54 has an upper media sheet and second tray 53 has an upper media sheet, each of which can be selectively picked as the “top sheet” by selective placement of pickup roller 37. In contrast, in the configuration of claim 1, the top sheet can only be in one of the first media tray and said second media tray, i.e., the top sheet is the uppermost sheet of both trays together.

Accordingly, claim 1 is believed allowable over Watanabe.

Rejected claims 2 and 5-8 and 10 depend, directly or indirectly, from claim 1.

Accordingly, claims 2 and 5-8 and 10 are also believed allowable in their present form. In addition, claims 2 and 5-8 and 10 further and patentably define the present invention over Watanabe.

Claim 11, as amended, recites in part, “a sheet feeder mechanism having a sheet picking roller, said sheet feeder mechanism including a *biasing mechanism* coupled to said sheet picking roller, said sheet picking roller being biased by said biasing mechanism to move in a first direction to pick a sheet of print media from said first media tray and said sheet picking roller being biased in said first direction to pick a sheet of print media from said second media tray, and said first media tray and said second media tray being arranged such that said second print media tray must be empty before said sheet picking roller of said sheet feeder mechanism can engage a sheet of said first print media held by said first media tray.”

The term “bias” is used consistent with the traditional meaning in the mechanical arts, wherein bias is brought about by a reference force that is applied constantly. In contrast to claim 11, Watanabe does not provide a “bias mechanism” to *bias* pickup roller 37, but rather, discloses a motor

driven lead screw arrangement for selectively positioning pickup roller 37 in direction x and vertically in direction y (column 3, lines 49-68).

In addition, Watanabe does not disclose, teach or suggest a configuration wherein the first media tray and the second media tray are arranged such that the second print media tray must be empty before the sheet picking roller of said sheet feeder mechanism can engage a sheet of the first print media held by the first media tray.

Accordingly, claim 11 is believed allowable over Watanabe.

Rejected claims 13-17 and 19 depend, directly or indirectly, from claim 11. Claims 13-17 and 19 are believed allowable in their present form in view of their respective dependence from claim 11. In addition, claims 13-17 and 19 further and patentably define the present invention over Watanabe.

Claim 20 as amended is believed allowable for substantially the same reasons set forth above with respect to claim 1.

Claim 23 as amended recites, in part, “a primary media tray for holding a primary print media; a frame including a cross support that extends across a width of said primary media tray; and an auxiliary media tray pivotably coupled to said cross support, said auxiliary media tray being configured for holding a second print media.” (Emphasis added). Watanabe does not disclose, teach or suggest a configuration wherein the frame includes a cross support that extends across a width of the primary media tray, and wherein an auxiliary media tray is pivotably coupled to the cross support.

Accordingly, claim 23 is believed allowable over Watanabe.

Claim 24 is believed allowable in its present form in view of its dependence from claim 23. In addition, claim 24 further and patentably defines the present invention over Watanabe.

Claims 1-5, 8, 10-14, 17, and 19-24 were rejected under 35 U.S.C. 102(b) as being unpatentable over US 6,227,533 (Jang).

Claim 1 as amended recites, in part, that “said top sheet of print media being located in only one of said first media tray and said second media tray” and that “said sheet feeder mechanism including a biasing mechanism coupled to said sheet picking roller, said sheet picking roller being biased by said biasing mechanism to move in a first direction to engage said top sheet of print media, regardless of which of said first media tray and said second media tray contains said top sheet of print media.” In contrast to claim 1, Jang discloses that the pickup rollers 510 are vertically stationary. See Jang Figs. 1-4; column 3, lines 45-49 (first tray 220 is biased toward pickup rollers 510).

Accordingly, claim 1 is believed allowable over Jang.

Rejected claims 2-5, 8 and 10 depend, directly or indirectly, from claim 1. Claim 3 has been canceled. Accordingly, claims 2, 4, 5, 8 and 10 are also believed allowable in their present form. In addition, claims 2, 4, 5, 8 and 10 further and patentably define the present invention over Jang.

Claim 11, as amended, recites in part, “a sheet feeder mechanism having a sheet picking roller, said sheet feeder mechanism including a *biasing mechanism* coupled to said sheet picking roller, said sheet picking roller being biased by said biasing mechanism to move in a first direction to pick a sheet of print media from said first media tray and said sheet picking roller being biased in said first direction to pick a sheet of print media from said second media tray, and said first media tray and said second media tray being arranged such that said second print media tray must be empty before said sheet picking roller of said sheet feeder mechanism can engage a sheet of said first print media held by said first media tray.” (Emphasis added). In contrast to claim 11, Jang discloses that the pickup rollers 510 are vertically stationary. See Jang Figs. 1-4; column 3, lines 45-49 (first tray 220 is biased toward pickup rollers 510).

Accordingly, claim 11 is believed allowable over Jang.

Rejected claims 12-14, 17 and 19 depend, directly or indirectly, from claim 11. Claim 12 has been canceled. Claims 13, 14, 17 and 19 are believed allowable in their present form in view of their respective dependence from claim 11. In addition, claims 13, 14, 17 and 19 further and patentably define the present invention over Jang.

Claim 20 is believed allowable for substantially the same reasons set forth above with respect to claim 1.

Claim 21 has been canceled.

Claim 22 depends from claim 20. Claim 22 is believed allowable in its present form in view of its dependence from claim 20. In addition, claim 22 further and patentably defines the present invention over Jang.

Claim 23 as amended recites, in part “a primary media tray for holding a primary print media; a frame including a cross support that extends across a width of said primary media tray; and an auxiliary media tray pivotably coupled to said cross support, said auxiliary media tray being configured for holding a second print media.” (Emphasis added). Jang does not disclose, teach or suggest a configuration wherein the frame includes a cross support that extends across a width of the primary media tray; and wherein an auxiliary media tray is pivotably coupled to the cross support.

Accordingly, claim 23 is believed allowable over Jang.

Claim 24 is believed allowable in its present form in view of its dependence from claim 23. In addition, claim 24 further and patentably defines the present invention over Jang.

Applicants submit that the pending claims are definite and do particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Moreover, for the foregoing reasons, the cited references do not teach, disclose or suggest the subject matter of the pending claims. The pending claims are therefore in condition for allowance, and Applicants respectfully request withdrawal of all rejections and allowance of the claims.

In the event Applicants have overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicants hereby conditionally petition therefor and authorize that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.

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